

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

NELSON L. BRUCE,)	
)	
Plaintiff,)	
)	
v.)	
)	CASE NO.: 2:22-cv-01292-BHH-MGB
REV FEDERAL CREDIT UNION, TRANS)	
UNION, LLC, and UNKNOWN DOES 1-100,)	
)	
Defendants.)	

**DEFENDANT TRANS UNION LLC'S
MOTION FOR LEAVE TO FILE ADDITIONAL PAGES**

COMES NOW, Defendant Trans Union LLC (“Trans Union” or “Defendant”), and files its Motion for Leave to File Additional Pages (“Motion”) pursuant to Local Civil Rule 7.05(B)(1), DSC. Trans Union respectfully requests that this Court enter an order allowing Trans Union to exceed the thirty-five (35) page limit for initial briefs in support of motions filed in this Court. Trans Union respectfully sets forth its reasoning in support of its Motion for Leave as follows:

1. In accordance with the current Scheduling Order, the dispositive motion deadline in this matter is April 4, 2024. ECF No. 138. Trans Union intends and expects to file its Motion for Summary Judgment on or before that date.

2. Pursuant to Local Civil Rule 7.05(B)(1), initial briefs supporting motions are limited to thirty-five (35) double spaced pages.

3. In this litigation, Plaintiff has asserted that Trans Union violated §§ 1681e(a), 1681e(b) and 1681i the federal Fair Credit Reporting Act, 15 U.S.C. § 1681, *et seq.* (“FCRA”). *See* ECF No. 29. Plaintiff has also asserted claims for violations of Sout Carolina Code §§ 37-20-170, *et seq.* and 37-20-200, *et seq.* and common law defamation. *See id.* Furthermore, Plaintiff has requested injunctive relief. *See id.*

4. The claims raised by Plaintiff in this litigation are set forth in numerous causes of action. The claims embrace or are premised upon a number of underlying account disputes.

5. In order to comprehensively address Plaintiff's numerous claims, Trans Union respectfully requests leave to file up to fifteen (15) additional pages to its brief supporting its Motion for Summary Judgment, if necessary. Trans Union will endeavor to include only information relevant to the questions of law raised by Plaintiff's claims. Counsel will diligently edit the motion for summary judgment to ensure that the final work product is concise and focused on material facts.

6. This request for leave is made in good faith and is not sought for the purposes of delay. Further, granting Trans Union's motion will not prejudice any party.

WHEREFORE, for the reasons set forth herein, Trans Union respectfully requests leave to each file an additional fifteen (15) pages in its brief in support of its Motion for Summary Judgment in this matter.

< SIGNATURE BLOCK IS ON NEXT PAGE >

Respectfully submitted,

s/ Wilbur E. Johnson

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Date: March 28, 2024

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of March 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel of record registered to use the CM/ECF system in this action, as follows:

None.

I further certify that I forwarded a copy of the foregoing by email and U.S. First Class Mail to the following non-CM/ECF participants:

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s/ Wilbur E. Johnson

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